

1 Ali S. Razai (SBN 246,922)
ali.razai@knobbe.com
2 Sean M. Murray (SBN 213,655)
sean.murray@knobbe.com
3 Jacob R. Rosenbaum (SBN 313,190)
jacob.rosenbaum@knobbe.com
4 Christian D. Boettcher (SBN 342,950)
christian.boettcher@knobbe.com
5 **KNOBBE, MARTENS, OLSON & BEAR, LLP**
2040 Main Street
6 Fourteenth Floor
Irvine, CA 92614
7 Phone: (949) 760-0404
Facsimile: (949) 760-9502
8

9 Attorneys for Trove Brands, LLC
d/b/a The BlenderBottle Company
10

11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA
14

15 TROVE BRANDS, LLC d/b/a THE
BLENDERBOTTLE COMPANY, a Utah
16 limited liability company,

17 Plaintiff,

18 v.

19 TRRS MAGNATE LLC d/b/a HYDRA CUP,

20 Defendant.
21
22
23
24
25
26
27
28

Case No.: 2:22-cv-02222-TLN-CKD

**PLAINTIFF BLENDERBOTTLE'S
NOTICE OF MOTION AND MOTION
FOR PROTECTIVE ORDER**

Date: February 7, 2024

Time: 10:00 a.m.

Ctrm: 24, 8th floor

Hon. Troy L. Nunley

Hon. Carolyn K. Delaney

NOTICE OF MOTION AND MOTION

TO DEFENDANT TRRS MAGNATE LLC AND ITS COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 7, 2024, at 10:00 am or as soon thereafter as the matter may be heard, before the Hon. Carolyn K. Delaney on the 8th Floor, Courtroom 24 at 501 I Street, Sacramento, California, Plaintiff Trove Brands, LLC (“BlenderBottle”) will and hereby does move for a protective order (i) relieving it and its employees from the obligation to appear at the depositions noticed in Sacramento, and (ii) precluding Hydra Cup from noticing depositions of these witnesses outside the state of Utah. BlenderBottle is serving on Hydra Cup its portion of the Joint Statement Re Discovery Disagreement concurrently herewith.

This motion is based on this Notice of Motion and Motion, the parties’ Joint Statement re Discovery Disagreement and related declarations and exhibits, and the pleadings and papers filed in this action and any oral argument the Court may consider at this hearing.

This motion is made following a conference of counsel. Counsel for BlenderBottle and counsel for Hydra Cup met and conferred on the issues raised in the Joint Statement on January 3, 2024 in a good faith effort to resolve this issue but were unable to do so.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: January 17, 2024

By: /s/ Jacob R. Rosenbaum

Ali S. Razai
Sean M. Murray
Jacob R. Rosenbaum
Christian D. Boettcher

Counsel for Plaintiff TROVE BRANDS, LLC d/b/a THE BLENDERBOTTLE COMPANY

CERTIFICATE OF SERVICE

I am a citizen of the United States of America, and I am employed in Irvine, California. I am over the age of 18 and not a party to the within action. My business address is 2040 Main Street, Fourteenth Floor, Irvine, California.

On January 17, 2024, I served **PLAINTIFF BLENDERBOTTLE'S NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER** on Defendant TRRS Magnate LLC d/b/a Hydra Cup shown below via CM/ECF:

CASEY SCOTT MCKAY
casey@mclaw.io
1441 U St. NW, Suite 712
Washington, DC, D.C. 20009
Telephone: (202) 743-1972

MEGHAN PRATSCHLER
meghan@meghantheattorney.com
95 3rd St., 2nd Floor
San Francisco, CA 94103-3103
Telephone: (415) 335-9226

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on January 17, 2024, at Irvine, California.

/s/ Claire Stoneman
Claire Stoneman